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August 16, 2022

**VIA ECF**

Honorable Vera M. Scanlon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Payamps v. City of New York et al.,  
22-CV-0563 (AMD) (VMS)

Your Honor:

I am a Senior Counsel in the Office of the Honorable Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York ("City"), Mayor Bill de Blasio, New York City Police Commissioner Dermot Shea, New York City Police Department ("NYPD") Chief of Department Terence Monahan, Police Officer Daniel Auguste, and Police Officer Corey Johnson (collectively "Defendants") in the above-referenced matter. Defendants write to respectfully request an enlargement of time, from August 17, 2022 to August 26, 2022 to file the City's answer to Defendant Lance's Crossclaim. This is Defendants' first request for such an enlargement. Defendant Lance consents to this request.

The undersigned is scheduled to begin trial before the Honorable Rachel P. Kovner in the Eastern District of New York from August 17, 2022 until, at the earliest, August 19, 2022, but possibly until August 22, 2022. As a result, the undersigned has been consumed by trial preparation and has been unable to devote the time needed to finalize a response to Defendant Lance's Crossclaim. The nine-day enlargement to August 26, 2022 will afford Defendants' the time needed to submit their response.

In light of the foregoing, Defendants' respectfully request an enlargement of time, from August 17, 2022 to August 26, 2022 to file Defendants' answer to Defendant Lance's Crossclaim.

Defendants thank the Court for its time and consideration of this request.

By: /s/   
Michael Pesin-Virovets  
*Senior Counsel*

cc: **By ECF**  
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